

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
LYNDA T. STEWART,

Plaintiff,

- against -

FASHION INSTITUTE OF TECHNOLOGY,

Defendant.
----- X

X

:

:

:

:

:

:

:

:

:

:

:

X

18-CV-12297 (LTS-KNF)

DECLARATION OF CHRISTIE DEL REY-CONE, ESQ.

I, CHRISTIE DEL REY-CONE, declare under the penalty of perjury:

1. I am a partner with the law firm Cerasia & Del Rey-Cone LLP, attorneys for plaintiff Lynda T. Stewart. Pursuant to Local Civil Rule 1.4, I submit this Declaration in support of my law firm's motion to withdraw as Ms. Stewart's counsel.

2. Recently, Ms. Stewart and I had an irreconcilable breakdown in communication, which directly impacts my law firm's ability to continue to represent her in this action.

3. On December 28, 2018, my law firm filed Ms. Stewart's Complaint in this action. Currently, defendant Fashion Institute of Technology must answer or otherwise move in response to the Complaint by March 4, 2019.

4. Cerasia & Del Rey-Cone LLP is not asserting a retaining or charging lien against Ms. Stewart.

5. I respectfully submit that permitting my law firm to withdraw as counsel for Ms. Stewart will not prejudice any party, and therefore respectfully request that the Court grant the Motion to Withdraw as to myself and Alison Tomasco, as well as stay the case for thirty (30) days so that Ms. Stewart may secure successor counsel.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Date Executed: New York, New York
February 13, 2019

s/ Christie Del Rey-Cone

Christie Del Rey-Cone